

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Gustavo RODRIGUEZ-PIEDRA

Case No. 3:25-mj-00070

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 6, 2025 in the county of Montgomery in the Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

Title 8, U.S.C., s. 1326(a)

Reentry of a Previously Removed Alien

This criminal complaint is based on these facts:

See Attached Affidavit of Christopher Brzozowski

☒ Continued on the attached sheet.

Christopher Brzozowski

Complainant's signature

SA Christopher Brzozowski

Printed name and title

Sworn to before me and signed in my presence by telephone.

Date: 2/10/25

City and state: Dayton, Ohio

Peter B. Silvain, Jr.  
United States Magistrate Judge



**A F F I D A V I T**

I, Christopher F. Brzozowski, being duly sworn, do hereby depose and say:

1. I am a Special Agent with the Drug Enforcement Administration (DEA). On or about January 22, 2025, the Acting Department of Homeland Security Secretary authorized law enforcement officials at the DEA to perform the functions of an immigration officer granted to the Department of Homeland Security (DHS) in Chapter 12 of Title 8 of the United States Code. On January 25, 2025 the Acting Attorney General consented and approved of that conferral of authority.

2. This affidavit is made in support of a criminal complaint charging Gustavo RODRIGUEZ-PIEDRA with violating 8 U.S.C. § 1326(a), Reentry of a Previously Removed Alien. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and/or information obtained from official documents, databases, other law enforcement agents, and witnesses. This affidavit is intended to show that there is probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of, or investigation into this matter.

3. On or about February 6, 2025, Dayton police found RODRIGUEZ-PIEDRA in the Southern District of Ohio and arrested him in connection with allegations of domestic violence.

4. Based on my training and experience, I know that a DHS “A-File” is a file in which all immigration records are maintained for aliens admitted or found to be illegally present in the United States. I also know that a DHS A-File usually contains forms, photographs, fingerprints, court records of conviction, and all records relating to deportation or other actions by DHS (or the Immigration and Naturalization Service) with respect to the subject alien for whom the DHS A-File is maintained. The A-file corresponds with an “A-number,” a unique number assigned to foreign nationals as they undergo proceedings through the United States immigration system.

RODRIGUEZ-PIEDRA's A-file is maintained under A-number 200811713. I know that in addition to A-files, DHS utilizes numerous databases and indices to store immigration related information that correlates with documents found in the A-file. RODRIGUEZ-PIEDRA did not make any statements and requested an attorney.

5. On February 10, 2025, RODRIGUEZ-PIEDRA was transported to the office of Homeland Security Investigations ("HSI") Cincinnati for additional processing. Upon arriving, RODRIGUEZ-PIEDRA's fingerprints were scanned and enrolled in various DHS databases, which confirmed the subject's identity, immigration and criminal history. RODRIGUEZ-PIEDRA did not make any statements and requested an attorney.

6. I have reviewed information from DHS databases and determined the following:

- a. RODRIGUES-PIEDRA is a citizen of MEXICO.
- b. On or about July 8, 2010, RODRIGUEZ-PIEDRA was ordered removed from the United States by Immigration Judge Thomas W. Janas at or near Cleveland, OH.
- c. RODRIGUEZ-PIEDRA was then officially removed and deported from the United States on or about July 14, 2010 at or near Harlingen, TX

7. HSI has reviewed DHS Indices that track lawful entries into the United States. Those indices indicated that RODRIGUEZ-PIEDRA had not lawfully entered the United States, nor had he applied for nor obtained permission from the Attorney General of the United States or her designated successor or the Secretary of Homeland Security, to re-enter the United States legally since RODRIGUEZ-PIEDRA had last been deported.

8. Based on the foregoing facts, there is probable cause to believe that RODRIGUEZ-PIEDRA has violated 8 U.S.C. 1326(a), Reentry of a Previously Removed Alien.

*Christopher Brzozowski*

Christopher F. Brzozowski  
Special Agent - DEA

Subscribed and sworn to me by telephone on this the 10th day of February, 2025.

*Peter B. Silvain, Jr.*

Peter B. Silvain, Jr.  
United States Magistrate Judge

